

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA**

MICHELLE ANDERSON, an individual,
On Behalf of Herself and All Others
Similarly Situated,

Plaintiff,

v.

TRAVELEX INSURANCE SERVICES
INC. and TRANSAMERICA CASUALTY
INSURANCE COMPANY,

Defendants.

Case No. 8:18-cv-00362-JMG-SMB

**PLAINTIFF'S UNOPPOSED MOTION
FOR PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT**

Pursuant to Federal Rule of Civil Procedure 23(e), Plaintiff Michelle Anderson hereby moves the Court to enter the proposed Preliminary Approval Order, which: (1) preliminarily approves the class action Settlement reached in the matter; (2) preliminarily certifies the Settlement Class; (3) appoints Plaintiff Michelle Anderson as the Class Representative; (4) appoints Shanon J. Carson, Peter R. Kahana, Lane L. Vines, Y. Michael Twersky, and John G. Albanese of Berger Montague PC as Lead Counsel for the Settlement Class; (5) approves the proposed Notice Program and issuance of Notice to Settlement Class Members; (6) sets forth procedures for opting out of or objecting to the Settlement; (7) bars Settlement Class members (that have not requested exclusion) from asserting any claims for which a release will be given if the Court approves the Settlement; and (8) schedules a Final Approval Hearing to consider final approval of the Settlement.

In support of her Motion, Plaintiff relies on the concurrently-filed Memorandum of Law in support thereof and the exhibits attached thereto. Defendants Travelex Insurances Services, Inc., and Transamerica Casualty Insurance Company do not oppose the relief sought in this Motion.

Dated: June 11, 2021

Respectfully submitted,

/s/ John G. Albanese

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*Counsel for Plaintiff and the Proposed Settlement
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on June 11, 2021, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on the following counsel of record via transmission of Notices of Electronic Filing generated by CM/ECF:

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